

# **Exhibit 3**

## ***Excerpted***

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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H. CHRISTINA CHEN-OSTER, :  
SHANNA ORLICH; ALLISON GAMBA; : NO. 10-cv-6950-AT-RWL  
and MARY DE LUI :  
Plaintiffs, :  
vs. :  
GOLDMAN SACHS & CO. and THE :  
GOLDMAN SACHS GROUP, INC., :  
Defendants. :

X-----X

ATTORNEYS' EYES ONLY - CONFIDENTIAL

CIVIL ACTION VIDEOTAPED DEPOSITION OF: ERIKA IRISH BROWN

C O M P U T E R I Z E D T R A N S C R I P T  
of the stenographic notes of the proceedings in the  
above-entitled matter as taken by and before Rosalie A.  
Kramm, Certified Shorthand Reporter No. 5469, Certified  
Realtime Reporter, taken remotely on November 13, 2020,  
commencing at 10:06 a.m.

Job No. 4335629

Pages 1-165

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1 A P P E A R A N C E S:

2

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19

20 ALSO PRESENT:

21 ADAM HEFT, ESQ. - Goldman Sachs

22 DAVID HALVORSON - Videographer

23

24

25

1 MS. OSTRAGER: Objection. And to the extent 10:19:43  
2 your answer would rest on any privileged information, I 10:19:45  
3 instruct you not to answer. 10:19:49  
4 BY MR. LEVIN-GESUNDHEIT: 10:19:53  
5 Q. Do you recall learning about any case events 10:19:54  
6 that have occurred in this case? 10:19:56  
7 MS. OSTRAGER: Same objection. 10:19:59  
8 BY MR. LEVIN-GESUNDHEIT: 10:20:02  
9 Q. From someone besides counsel. 10:20:03  
10 A. I'm not sure what a case event is, so I can't 10:20:09  
11 answer that. 10:20:13  
12 Q. Perhaps -- do you recall hearing about any 10:20:16  
13 decisions by the judge in this case, from anyone besides 10:20:18  
14 counsel? 10:20:23  
15 A. Just only what's been reported in the press; 10:20:25  
16 and, you know, my role is focused on the forward, and 10:20:30  
17 that's what I'm focused on. 10:20:34  
18 Q. Have you been involved in any -- in crafting 10:20:38  
19 any messages to Goldman employees about this case? 10:20:41  
20 MS. OSTRAGER: Objection. And to the extent 10:20:46  
21 that your answer would call for privileged information, I 10:20:48  
22 instruct you not to answer. 10:20:50  
23 MR. LEVIN-GESUNDHEIT: Counsel, I'm not asking 10:20:52  
24 for any conversations with counsel about anything. I'm 10:20:53  
25 just asking if she has been involved in crafting messages 10:20:56

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1 to Goldman Sachs employees about this case. I don't 10:20:58  
2 think that calls for any privileged information. 10:21:01  
3 MS. OSTRAGER: Well, it may, depending on 10:21:04  
4 whether -- and I'm not saying that this occurred, but -- 10:21:06  
5 I have no basis to believe that it did. But to the 10:21:08  
6 extent that there are any communications that involved 10:21:12  
7 counsel that relate to the subject matter you're asking 10:21:14  
8 about, that would be privileged. 10:21:17  
9 MR. LEVIN-GESUNDHEIT: I'm not asking for any 10:21:18  
10 communications with counsel. I'm just asking a "yes" or 10:21:19  
11 "no" question. 10:21:21  
12 BY MR. LEVIN-GESUNDHEIT: 10:21:22  
13 Q. Have you been involved in crafting messages to 10:21:22  
14 Goldman Sachs employees about this case? 10:21:25  
15 A. About the case? No. 10:21:32  
16 Q. Okay. Did you take any notes during your 10:21:34  
17 meetings with counsel to prepare this week? 10:21:38  
18 A. No. 10:21:46  
19 MS. OSTRAGER: Objection. 10:21:46  
20 BY MR. LEVIN-GESUNDHEIT: 10:21:49  
21 Q. Have you discussed your participation in this 10:21:50  
22 deposition with anyone besides your attorneys? 10:21:52  
23 A. I mentioned it to my husband, but that's it. 10:22:00  
24 Q. What -- so you mentioned earlier that you 10:22:07  
25 learned about this lawsuit while you were working in the 10:22:10

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1	A. Yes.	10:35:12
2	Q. So you worked at Bloomberg at that -- in that	10:35:14
3	role from March 2015 until you came to Goldman Sachs; is	10:35:16
4	that right?	10:35:19
5	A. That's correct.	10:35:20
6	Q. Did you work at Bloomberg until July 2018?	10:35:22
7	A. Yes.	10:35:28
8	Q. Was there a gap between Bloomberg and Goldman	10:35:30
9	of any amount of time?	10:35:34
10	A. I think I may have taken a week, if that.	10:35:37
11	Q. Okay. Do you recall when in 2018 you started	10:35:41
12	at Goldman -- I'm sorry, when in July?	10:35:44
13	A. July -- July 29th, I believe, was the Monday	10:35:48
14	that I started.	10:35:56
15	Q. Do you recall when you gave notice at -- at	10:35:59
16	Bloomberg?	10:36:01
17	A. I really don't. I mean I didn't just walk out.	10:36:07
18	I --	10:36:10
19	Q. Right.	10:36:12
20	A. I must have given them at least three weeks'	10:36:14
21	notice. I really don't know. I don't want to misspeak.	10:36:20
22	Q. Okay.	10:36:23
23	A. But it was an amiable departure, and I still	10:36:23
24	have very great relationships there, so I did not abandon	10:36:27
25	them.	10:36:31

1 inclusion. I think that covers quite a bit. 10:38:31

2 So some commercial, mostly HR. 10:38:39

3 Q. So were you -- when you mentioned "commercial," 10:38:43

4 were you involved in the promotion of any Bloomberg 10:38:45

5 products? 10:38:50

6 A. When you say "the promotion," I'm not sure what 10:38:53

7 you mean. 10:38:57

8 Q. Were you involved in marketing any Bloomberg 10:39:01

9 products? 10:39:04

10 A. In helping to set up meetings with HBCUs around 10:39:04

11 the product, yes. 10:39:08

12 Q. Did you work on pay equity at all at Bloomberg? 10:39:12

13 A. Only as it -- as it pertained to the reporting 10:39:20

14 requirements for the gender pay gap in the U.K. 10:39:24

15 Q. What -- how specifically were you involved in 10:39:33

16 the reporting requirements for the gender pay gap in the 10:39:37

17 U.K.? 10:39:41

18 A. I reviewed what our, you know, team put 10:39:42

19 together for submission to the government. 10:39:45

20 Q. I see. Do you recall what the pay gap was in 10:39:48

21 the U.K.? 10:39:59

22 A. No. 10:40:01

23 Q. For Bloomberg? 10:40:01

24 A. No. 10:40:02

25 Q. Do you recall whether there was a pay gap? 10:40:03

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1 BY MR. LEVIN-GESUNDHEIT: 10:42:05

2 Q. You can answer. 10:42:05

3 A. We did -- as part of the compensation process, 10:42:09

4 the compensation team looked at like for like role 10:42:16

5 comparisons, yes. But that was not the main function of 10:42:19

6 a diversity and inclusion team. 10:42:24

7 Q. Okay. But you're familiar with those types of 10:42:26

8 analyses. 10:42:29

9 A. Yes. 10:42:30

10 Q. Okay. Are you familiar with the Bloomberg 10:42:31

11 Gender-Equality Index? 10:42:34

12 A. I am. 10:42:37

13 MS. OSTRAGER: Object to the relevance. 10:42:39

14 BY MR. LEVIN-GESUNDHEIT: 10:42:40

15 Q. How did you become familiar with the gender -- 10:42:40

16 Bloomberg Gender-Equality Index? 10:42:45

17 A. I was involved with it as an employee of 10:42:48

18 Bloomberg in creating it. 10:42:50

19 Q. Were you involved in selecting the questions 10:42:54

20 that would be asked of companies that participated in the 10:42:59

21 index? 10:43:03

22 A. Yes, I was involved in identifying questions to 10:43:07

23 be asked, yes. 10:43:10

24 Q. So in 2018 when you started at Goldman Sachs, 10:43:29

25 your position was Chief Diversity Officer; is that right? 10:43:32

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1 A. Yes. 10:43:37

2 Q. Is that still your title? 10:43:38

3 A. Yes. 10:43:40

4 Q. Who -- whom do you report to? 10:43:42

5 A. The head of HCM, which is Bentley de Beyer. 10:43:46

6 Q. And previous to that it was Dane Holmes? 10:43:52

7 A. That's correct. 10:43:54

8 Q. And who reports to you directly? 10:43:59

9 A. I have five direct reports. Yes, five direct 10:44:03

10 reports, and it's the EMEA head of diversity, the APAC 10:44:10

11 head of diversity, the India head of diversity, the 10:44:18

12 Americas head of diversity, and my COO. 10:44:24

13 Q. Who is the Americas head of diversity? 10:44:28

14 A. Nadine Augusta. 10:44:31

15 Q. How long has Nadine been in that role? 10:44:35

16 A. I would have to check her start date. I 10:44:42

17 believe -- I feel like she started in March of 2019. 10:44:46

18 Q. So that was after you started. 10:45:08

19 A. Yes. 10:45:09

20 Q. Who -- 10:45:11

21 A. I hired her. 10:45:11

22 Q. Who was -- you hired her? 10:45:13

23 A. Yes. 10:45:15

24 Q. Had you worked with her before? 10:45:16

25 A. She had been on the diversity and inclusion 10:45:19

1 now the conversations will be delivered in short-order. 11:32:12

2 Q. Are you aware of any other changes to the 360 11:32:39

3 besides moving from quartiling to the three expectation 11:32:43

4 categories that you described? 11:32:49

5 A. Not that I can think of. 11:33:02

6 Q. Turning back to manager quartiling, in the 11:33:09

7 instances where you observed a data analysis about 11:33:14

8 manager quartiling, that prompted you to ask ELG for 11:33:21

9 follow-up, has ELG provided you with an explanation of 11:33:28

10 those results? 11:33:35

11 MS. OSTRAGER: I'm going to object to the 11:33:39

12 extent that this line of questioning calls for privileged 11:33:40

13 conversations between the witness and ELG and instruct 11:33:44

14 the witness not to answer. 11:33:47

15 MR. LEVIN-GESUNDHEIT: Counsel, I'm not asking 11:33:49

16 her for what ELG told her. I'm just asking whether ELG 11:33:50

17 engaged with her at all. 11:33:56

18 MS. OSTRAGER: She -- the witness previously 11:34:00

19 testified about her interactions with ELG on this topic. 11:34:01

20 MR. LEVIN-GESUNDHEIT: Okay. 11:34:10

21 BY MR. LEVIN-GESUNDHEIT: 11:34:14

22 Q. So you testified that there are times when 11:34:14

23 you've seen results with respect to 360 review, and 11:34:17

24 you've asked questions of ELG; is that right? 11:34:23

25 MS. OSTRAGER: Objection. Asked and answered. 11:34:27

1 she said that she asked questions. I'm asking whether 11:35:57  
2 she received answers. 11:36:00  
3 MS. OSTRAGER: Same objection. 11:36:04  
4 MR. LEVIN-GESUNDHEIT: Okay. 11:36:05  
5 BY MR. LEVIN-GESUNDHEIT: 11:36:06  
6 Q. You can answer. Have you received answers to 11:36:07  
7 your questions about -- have you received answers to your 11:36:09  
8 questions of ELG about manager quartiling? 11:36:19  
9 MS. OSTRAGER: Objection to the form. 11:36:26  
10 THE WITNESS: So if I have raised something 11:36:28  
11 with ELG, they let me know whether or not they have -- 11:36:32  
12 you know, they follow up and say that they looked into 11:36:38  
13 it. So I think the answer is that they are responsive to 11:36:40  
14 the issues that I raise when I raise them. 11:36:51  
15 BY MR. LEVIN-GESUNDHEIT: 11:36:55  
16 Q. So specifically with respect to manager 11:36:56  
17 quartiling, when you have asked questions, ELG has 11:36:59  
18 provided you an analysis to answer your questions; is 11:37:09  
19 that right? 11:37:13  
20 MS. OSTRAGER: Objection to the form. 11:37:15  
21 Objection, asked and answered. And objection to the 11:37:17  
22 extent that the question calls for any privileged 11:37:19  
23 conversations between the witness and ELG. 11:37:22  
24 MR. LEVIN-GESUNDHEIT: I'm not asking for any 11:37:24  
25 conversations with the witness and ELG. 11:37:25

1 Q. Do you know if there is a regular note-taker 11:49:39  
2 for GIDC meetings? 11:49:41  
3 A. A regular note-taker? That I don't know. I 11:49:45  
4 think we all take notes. I'm not -- I -- it is not my 11:49:50  
5 knowledge of, like -- you know, like an official 11:49:58  
6 recording secretary, like that I am not aware of. 11:50:01  
7 Q. Do you know if the meeting -- strike that. 11:50:06  
8 Do you know if the presentation to the 11:50:10  
9 management committee about aspirational goals that you 11:50:12  
10 recall occurring was videotaped? 11:50:15  
11 A. I have no -- I don't. 11:50:18  
12 Q. Does the GIDC provide updates to David Solomon 11:50:29  
13 apart from its updates to the management committee? 11:50:33  
14 A. I do not know -- I mean I don't know what 11:50:45  
15 the -- what the chairs provide him on an ongoing basis. 11:50:52  
16 I think there is -- I mean I think there is constant 11:51:00  
17 communication. So I think the information you're looking 11:51:03  
18 for in terms of formal or episodic is not really as much 11:51:08  
19 the case as the constant communication. 11:51:14  
20 Q. Has David Solomon attended any GIDC meetings? 11:51:24  
21 A. No. Not since I've been at the firm. 11:51:30  
22 Q. Has the GIDC discussed this lawsuit? 11:51:53  
23 A. No. 11:51:57  
24 Q. Did you receive briefing about this lawsuit 11:52:03  
25 within your role as a GIDC member? 11:52:06

1 MS. OSTRAGER: Objection. Asked and answered. 11:52:13

2 And I object to the extent that this question would call 11:52:14

3 for any privileged communications. 11:52:18

4 MR. LEVIN-GESUNDHEIT: I'm not asking for any 11:52:20

5 communications with counsel. 11:52:21

6 THE WITNESS: I don't recall any brief -- and 11:52:27

7 this is a legal matter, right? Again, I want to be 11:52:29

8 clear. We're not compliance. Right? We're not ELG. 11:52:33

9 What we're focused on is recruitment, retention, 11:52:39

10 development, what programs, the inclusion networks, you 11:52:43

11 know, how we restructure them, how we elevate them, how 11:52:47

12 we align them to senior leadership. 11:52:52

13 So I cannot recall any segment of a GIDC 11:52:55

14 meeting on this. 11:53:10

15 MR. LEVIN-GESUNDHEIT: I'd like to introduce an 11:53:26

16 exhibit. Court reporter, can you remind me what exhibit 11:53:27

17 number we decided to start with? 11:53:43

18 THE REPORTER: I believe it is Exhibit 110. 11:53:46

19 (Exhibit 110 was marked for identification.) 11:53:49

20 BY MR. LEVIN-GESUNDHEIT: 11:53:49

21 Q. I'm marking this exhibit as Exhibit 110. This 11:53:50

22 is an exhibit that begins with Bates number GS0834578, 11:53:58

23 entitled, "Global Diversity Committee Kickoff Meeting," 11:54:07

24 dated July 25th, 2018. 11:54:13

25 Do you have the exhibit in front of you, 11:54:21

1 firm to ensure that happens. We have conducted an 14:33:02  
2 analysis that shows women at the firm on average make 99 14:33:02  
3 percent of what men earn." 14:33:02  
4 Have you seen a statement like this before? 14:33:17  
5 A. I have seen this statement from this report 14:33:21  
6 referenced, yes. 14:33:27  
7 Q. Where have you seen it? 14:33:28  
8 A. I've seen it referenced in talking points when 14:33:32  
9 we released the following year's gender pay equity -- 14:33:38  
10 gender pay -- sorry -- gender pay gap report in the U.K. 14:33:42  
11 Q. Do you know what the basis is for the 99 14:33:56  
12 percent figure? 14:33:58  
13 A. It is my understanding -- again, this all 14:34:03  
14 predates me. So based on what I have been told, it is my 14:34:06  
15 understanding that the compensation team did an actual 14:34:12  
16 pay equity like-for-like review, and that was the 14:34:16  
17 conclusion they drew. 14:34:22  
18 Q. When did the compensation team do this? 14:34:33  
19 A. According to what's written in the report it 14:34:38  
20 was in 2017. I don't know when. I wasn't even thinking 14:34:40  
21 about Goldman Sachs in 2017. 14:34:43  
22 Q. Is it your understanding that the pay equity 14:34:47  
23 team does this review annually? 14:34:52  
24 A. Part of our compensation team's processes is 14:34:55  
25 exactly what it says in the document. Each year there is 14:34:58

1 a review done between men and women in similar roles with 14:35:13  
2 similar performance, as it says in the document. 14:35:18  
3 Q. During your time at Goldman Sachs, who on the 14:35:24  
4 pay equity team specifically has conducted this analysis? 14:35:28  
5 A. On the compensation team? 14:35:34  
6 Q. Let me reask the question. 14:35:37  
7 During your time at Goldman Sachs, who on the 14:35:39  
8 compensation team specifically has conducted this annual 14:35:42  
9 pay equity analysis? 14:35:46  
10 A. I do not know the individual names of who does 14:35:48  
11 it. 14:35:52  
12 Q. Do you recall any individual names of 14:35:57  
13 individuals involved in this analysis? 14:35:59  
14 A. I engaged with the heads of compensation, and 14:36:02  
15 they managed their teams. 14:36:06  
16 Q. Who are they? 14:36:08  
17 A. Scott Mehling and Michael Perloff. 14:36:10  
18 Q. When did you first become aware of the annual 14:36:20  
19 pay equity analysis conducted by the compensation team? 14:36:32  
20 A. I guess it would have been when -- you know, as 14:36:46  
21 I on-boarded, I met with every functional head and talked 14:36:48  
22 about their processes, and where the -- you know, what 14:36:52  
23 was the diversity lens, if any, that I should be aware of 14:36:58  
24 in terms of their processes. 14:37:02  
25 So that, I believe, would have been the first 14:37:04

1 time that it came up in conversation. 14:37:07

2 Q. Have you seen the analyses for any year? 14:37:11

3 A. No. 14:37:17

4 Q. Do you have any opinion about whether the 14:37:22

5 analyses conducted are valid? 14:37:24

6 MS. OSTRAGER: Object to the form. 14:37:30

7 THE WITNESS: I -- I think we have a really 14:37:34

8 strong compensation team, and I have a lot of faith in 14:37:37

9 the senior leadership on that team, and have no reason to 14:37:44

10 believe otherwise. 14:37:48

11 BY MR. LEVIN-GESUNDHEIT: 14:37:49

12 Q. What is your basis for -- do you have any 14:37:54

13 independent basis to verify the validity of the pay 14:37:59

14 equity analyses? 14:38:04

15 MS. OSTRAGER: Object to the form. 14:38:07

16 THE WITNESS: I do not do any independent work 14:38:11

17 on that, no. 14:38:13

18 BY MR. LEVIN-GESUNDHEIT: 14:38:16

19 Q. Have you asked any questions of the 14:38:28

20 compensation team regarding how it conducts its analysis? 14:38:30

21 A. I mean as I mentioned, in my on-boarding they 14:38:39

22 walked me through the analysis and their processes. So I 14:38:43

23 think that was inclusive of how they approached the 14:38:52

24 process. 14:38:55

25 Q. Did you ask any questions about how the process 14:38:59

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1 works? 14:39:03

2 A. It was a conversation. 14:39:05

3 Q. Do you recall any of the topics you asked 14:39:08

4 about? 14:39:11

5 A. No. I don't recall specific conversations 14:39:16

6 from, you know, September 2018. No. I don't. 14:39:20

7 Q. Do you know how the analyses compare employees 14:39:25

8 in similar roles to one another? 14:39:28

9 A. That, I feel like you -- I asked and answered 14:39:34

10 the question. Employees with similar roles with similar 14:39:37

11 performance. So I don't -- I don't know how -- 14:39:42

12 Q. Do you understand -- do you know how the 14:39:49

13 compensation team determines whether employees are within 14:39:50

14 similar roles? 14:39:53

15 A. It's based on -- on their jobs, the scope of 14:39:55

16 their role and their job -- and the job categories that 14:39:58

17 they're in and what their performance has been, and their 14:40:02

18 tenure, and that's about it. 14:40:05

19 Q. How do you know that? 14:40:10

20 A. I'm sorry? 14:40:12

21 Q. How do you know that? 14:40:13

22 A. Because I've had conversations with the 14:40:15

23 compensation team, with the leadership of the 14:40:18

24 compensation team. 14:40:22

25 Q. What do you mean by "job categories"? 14:40:24

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1	A. I mean, like, a -- you know, second-year	14:40:30
2	associate in banking versus a senior associate in	14:40:34
3	banking.	14:40:38

4	Q. Have you seen any documents explaining the 99	14:40:53
5	percent figure in any greater detail than what we've	14:40:56
6	looked at right now?	14:40:59

7	A. No.	14:41:00
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8 Q. Have you seen any documents explaining the 14:41:19

9 methodology underlying the pay equity analyses? 14:41:21

10	A. No.	14:41:29
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11 MS. OSTRAGER: Objection. Asked and answered. 14:41:30

12	BY MR. LEVIN-GESUNDHEIT:	14:41:31
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13	Q. Have you ever asked for any writings describing	14:42:06
14	the pay equity analysis -- analyses?	14:42:11

15	MS. OSTRAGER: Object to the form. Objection,	14:42:14
16	asked and answered.	14:42:16

17	THE WITNESS: No.	14:42:21
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18	BY MR. LEVIN-GESUNDHEIT:	14:42:22
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19	Q. You can answer the question.	14:42:43
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20	A. I did. I said, no.	14:42:45
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21	Q. Oh, okay.	14:42:47
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22	Are you aware of the methods by which the 99	14:42:55
23	percent figure has been disseminated within Goldman	14:43:01
24	Sachs?	14:43:04

25 MS. OSTRAGER: Object to the form. 14:43:07

1 THE WITNESS: Again, it was done before I 14:43:11  
2 arrived. It was clearly published in a public report 14:43:12  
3 that's also shared with the firm. You know, when we 14:43:18  
4 publish the sustainability reports, it is distributed all 14:43:21  
5 throughout the firm. So those are the only fact-based 14:43:24  
6 answers I can offer. 14:43:30  
7 BY MR. LEVIN-GESUNDHEIT: 14:43:33  
8 Q. Did you participate in any discussions with 14:43:42  
9 Goldman Sachs regarding pay equity during your time at 14:43:44  
10 Goldman Sachs? 14:43:48  
11 MS. OSTRAGER: Object to the form; objection, 14:43:50  
12 vague. 14:43:53  
13 THE WITNESS: So in regards to pay equity, 14:43:57  
14 other than the conversations that we referenced, no. 14:44:05  
15 BY MR. LEVIN-GESUNDHEIT: 14:44:11  
16 Q. Have you led any round tables at Goldman Sachs 14:44:15  
17 regarding pay equity? 14:44:19  
18 A. No. 14:44:23  
19 Q. Have you participated in any discussions with 14:44:25  
20 employees at Goldman Sachs regarding pay equity? 14:44:27  
21 A. Pay equity, no. 14:44:32  
22 Q. Have you participated in any discussions with 14:44:34  
23 employees at Goldman Sachs regarding the U.K. gender pay 14:44:37  
24 disclosure? 14:44:43  
25 A. Yes. I've had conversations with -- about the 14:44:44

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1 gender pay gap, yes. 14:44:48

2 Q. Within those conversations about the gender pay 14:44:50

3 gap, has Goldman's pay equity analysis been referenced? 14:44:54

4 MS. OSTRAGER: Object to the form. 14:45:05

5 BY MR. LEVIN-GESUNDHEIT: 14:45:06

6 Q. I don't know that your answer ended up on the 14:45:11

7 record. 14:45:13

8 A. Yes. 14:45:15

9 Q. Did the 99 percent figure come up in any of 14:45:20

10 those discussions? 14:45:23

11 A. Yes. 14:45:30

12 Q. Can you please tell me about each of those 14:45:33

13 discussions in which the 99 percent figure came up. What 14:45:35

14 is the first of those discussions you recall? 14:45:38

15 MS. OSTRAGER: Object to the form. 14:45:41

16 THE WITNESS: As I mentioned, we had talking 14:45:46

17 points that were shared based on a foot -- you know, 14:45:49

18 footnoted based on the 2017 sustainability report. 14:45:54

19 I cannot recall every round table, when it did 14:45:58

20 or didn't come up, but it was a talking point, and one 14:46:01

21 that I know that I used, so I said, yes, but to tell you 14:46:05

22 that in this round table I did versus that round table in 14:46:09

23 sharing the -- the gender pay gap information, I cannot 14:46:12

24 tell you. 14:46:18

25 //

1 BY MR. LEVIN-GESUNDHEIT: 15:04:34

2 Q. But you understood that David Solomon was 15:04:34

3 preparing for a meeting with members of Congress 15:04:36

4 occurring in January 2019, correct? 15:04:38

5 A. We understood that we were preparing talking 15:04:46

6 points for the government relations team for David 15:04:49

7 Solomon, yes. I do not know that we knew exactly the 15:04:53

8 timing of the meeting or anything else. 15:04:59

9 Q. So it's your testimony that this 99 percent 15:05:03

10 figure refers to an analysis covering 2017, but not 2018? 15:05:05

11 MS. OSTRAGER: Objection. 15:05:14

12 THE WITNESS: The data point that we have 15:05:16

13 referred to was the 2017 data point, yes. 15:05:17

14 BY MR. LEVIN-GESUNDHEIT: 15:05:23

15 Q. Do you know what the figure would be for 2018? 15:05:24

16 A. No. 15:05:29

17 MS. OSTRAGER: Object to the form. 15:05:30

18 BY MR. LEVIN-GESUNDHEIT: 15:05:32

19 Q. Have you ever seen the result of the 2018 15:05:33

20 analysis? 15:05:39

21 A. No. 15:05:45

22 Q. The next bullet point underneath reads: 15:05:52

23 "Compensation recommendations" -- sorry. Skip that. My 15:05:54

24 apologies. 15:06:00

25 The second bullet point underneath that reads: 15:06:01

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1 "If we ever find we are not being true to our commitment 15:06:03  
2 to equal pay for equal work, we make changes." 15:06:07  
3 What is the basis for this statement? 15:06:15  
4 A. So I did not write this statement, but as I've 15:06:22  
5 shared earlier, each year there -- the compensation team 15:06:27  
6 does this analysis. So I assume it is referencing the 15:06:31  
7 compensation team's ability to go back and raise any 15:06:38  
8 concerns they have based on their analysis. 15:06:45  
9 Q. You signed off on these talking points, 15:06:50  
10 correct? 15:06:52  
11 MS. OSTRAGER: Object to the form. 15:06:54  
12 BY MR. LEVIN-GESUNDHEIT: 15:06:55  
13 Q. Did you sign off on these talking points? 15:06:55  
14 A. I gave input into these talking points. 15:06:57  
15 Q. Did you object to this -- the inclusion of this 15:07:03  
16 bullet point? 15:07:07  
17 MS. OSTRAGER: Object to the form. 15:07:08  
18 THE WITNESS: It's not my role to object. I 15:07:12  
19 gave input into these talking points. And I don't have 15:07:15  
20 any reason to -- of concern with it either. 15:07:22  
21 BY MR. LEVIN-GESUNDHEIT: 15:07:32  
22 Q. In fact, you provided the diversity talking 15:07:33  
23 points. 15:07:35  
24 MS. OSTRAGER: Object to the form. 15:07:36  
25 THE WITNESS: I provided diversity talking 15:07:40

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1 points that did not include those exact words, to my 15:07:42  
2 knowledge. 15:07:47  
3 BY MR. LEVIN-GESUNDHEIT: 15:07:47  
4 Q. Are you aware of any changes that have been 15:08:00  
5 made in response to -- strike that. 15:08:02  
6 Are you aware of Goldman ever having found that 15:08:09  
7 it has not been, quote, true to its commitment to equal 15:08:14  
8 pay? 15:08:18  
9 A. I think -- I -- I can't -- am I personally -- 15:08:29  
10 do I believe that the -- the compensation team does this 15:08:33  
11 every year. So it is not part of my role to ask them, 15:08:36  
12 did they find anything this year. So, no, I don't do 15:08:48  
13 that. 15:08:52  
14 Q. So you're not aware of any changes ever having 15:08:53  
15 been made in response to a pay equity analysis. 15:08:57  
16 MS. OSTRAGER: Object to the form. 15:09:00  
17 Objection -- 15:09:01  
18 MR. LEVIN-GESUNDHEIT: Okay. I'll rephrase it. 15:09:03  
19 BY MR. LEVIN-GESUNDHEIT: 15:09:05  
20 Q. Are you aware of any changes ever having been 15:09:05  
21 made at Goldman Sachs in response to a pay equity 15:09:08  
22 analysis? 15:09:10  
23 A. Any specific examples? No. 15:09:14  
24 Q. Are you aware of any changes that have been 15:09:33  
25 made generally speaking in response to a pay equity 15:09:35

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1 analysis at Goldman Sachs? 15:09:40

2 MS. OSTRAGER: Object to the form; object, 15:09:41

3 vague; and object, asked and answered. 15:09:44

4 BY MR. LEVIN-GESUNDHEIT: 15:09:49

5 Q. You can answer. 15:09:50

6 A. Yeah, again, I -- I know what analyses we do. 15:09:51

7 Most of our processes are iterative processes. I -- it 15:09:56

8 is not what I do for the firm. And the role -- my role 15:10:01

9 is not like the police to check on everybody. Right? 15:10:06

10 You know, and if I can't trust my colleagues for what 15:10:12

11 their piece of their role is, right -- we all have roles 15:10:18

12 to play. So I don't check my colleagues' work like that, 15:10:23

13 no, I don't. 15:10:27

14 Q. Are you aware of anyone else who would have 15:10:49

15 been present at the meeting with Representatives Meeks 15:10:51

16 and Waters, besides David Solomon? 15:10:54

17 MS. OSTRAGER: Objection. Calls for 15:10:57

18 speculation. 15:10:57

19 THE WITNESS: I have no clue who was -- 15:11:00

20 actually, the -- the email said Dane went with him. So I 15:11:02

21 mean I'm only basing it on the email that you just showed 15:11:06

22 me. I don't remember that meeting, as I said. 15:11:09

23 BY MR. LEVIN-GESUNDHEIT: 15:11:15

24 Q. Do you have any independent basis to determine 15:11:33

25 whether the statement is true that we've read, that 15:11:35



1 statement being: "If we ever find we're not being true 15:11:39  
2 to our commitment to equal pay for equal work, we make 15:11:42  
3 changes"? 15:11:45  
4 MS. OSTRAGER: Object to the form and 15:11:46  
5 objection, asked and answered. 15:11:47  
6 THE WITNESS: I rely on the work of the 15:11:54  
7 compensation team. 15:11:57  
8 BY MR. LEVIN-GESUNDHEIT: 15:11:59  
9 Q. Do you have any independent basis? 15:12:04  
10 A. No. 15:12:06  
11 MS. OSTRAGER: Objection. Asked and answered 15:12:07  
12 several times now. 15:12:08  
13 MR. LEVIN-GESUNDHEIT: I'm just looking over 15:12:35  
14 this document for a second before we take a break. 15:12:36  
15 All right. You asked for a break. Let's take 15:12:50  
16 a break for ten minutes. Can we go off the record, 15:12:53  
17 please? 15:12:56  
18 MS. OSTRAGER: Yes. 15:12:57  
19 THE VIDEOTAPE OPERATOR: We're going off the 15:12:58  
20 record. The time is 3:13 p.m., and this is the end of 15:12:59  
21 Media Unit No. 4. 15:13:03  
22 (Recess was taken.) 15:13:04  
23 THE VIDEOTAPE OPERATOR: We're back on the 15:24:34  
24 record at 3:24 p.m., and this is the beginning of Media 15:24:34  
25 Unit No. 5. 15:24:37

1 BY MR. LEVIN-GESUNDHEIT: 15:24:39

2 Q. Thank you, Ms. Irish Brown. 15:24:43

3 Were you involved in preparing Goldman Sachs' 15:24:47

4 submission data to Bloomberg for inclusion in the 15:24:49

5 Bloomberg Gender-Equality Index? 15:24:53

6 A. Yeah, my team prepared that, yes. 15:24:57

7 Q. Did you sign off on the submission? 15:25:00

8 A. I reviewed it, yes. 15:25:02

9 Q. Was it accurate? 15:25:05

10 A. I believe it was. Yes. 15:25:08

11 Q. And you're also familiar -- are you familiar 15:25:14

12 with Goldman's results -- strike that. 15:25:16

13 Are you familiar with -- strike that. 15:25:19

14 Did Goldman become a member of the Bloomberg 15:25:27

15 Gender-Equality Index? 15:25:30

16 A. The Gender-Equality Index is -- is a listing of 15:25:34

17 companies, so, yes, we were on the list. 15:25:38

18 Q. Do you know what year Goldman first was listed? 15:25:41

19 A. I believe the submission was the end of 2018, 15:25:49

20 which gets, like -- is the 2019 submission based on the 15:25:53

21 prior year's data? I believe that's how that works. 15:25:58

22 Q. And you were also involved in -- in developing 15:26:05

23 the criteria used for the Gender-Equality Index while you 15:26:09

24 worked with Bloomberg? 15:26:17

25 A. It is not a criteria. It is a set of -- of 15:26:19

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1 questions. 15:26:22

2 Q. Were you involved in developing those 15:26:22

3 questions? 15:26:23

4 A. Yes. 15:26:24

5 MR. LEVIN-GESUNDHEIT: I'm going to introduce 15:26:39

6 an exhibit. This is Exhibit 120. That is incorrect. I 15:26:39

7 introduced the wrong document. My apologies. This is a 15:27:02

8 duplicate of an earlier exhibit. 15:27:08

9 (Exhibit 120 was marked for identification.) 15:27:10

10 BY MR. LEVIN-GESUNDHEIT: 15:27:58

11 Q. I'm now introducing the correct Exhibit 120. 15:27:58

12 Now, this is a -- this document is rather 15:28:04

13 large, so I think you'll probably need to zoom in when 15:28:07

14 you look at it. 15:28:11

15 A. Okay. 15:28:18

16 Q. This document was downloaded from a Bloomberg 15:28:18

17 terminal. It is entitled, "2020 Bloomberg 15:28:23

18 Gender-Equality Index Framework" for the company Goldman 15:28:25

19 Sachs. 15:28:30

20 It has a set of questions and answers. Are you 15:28:35

21 familiar with this type of document? 15:28:39

22 A. I am. 15:28:42

23 Q. Does this document reflect Goldman Sachs' 15:28:47

24 submission to Bloomberg for inclusion in the 2020 15:28:54

25 Gender-Equality Index? 15:28:58

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1 MS. OSTRAGER: Object to the time frame. 15:29:00

2 THE WITNESS: It says 2020 Gender-Equality 15:29:14

3 Index. And if you look at the data it is as of the end 15:29:14

4 of fiscal year 2018. I know there is a lag in the data. 15:29:22

5 BY MR. LEVIN-GESUNDHEIT: 15:29:27

6 Q. All right. So there's two columns with two 15:29:28

7 sets of answers. 15:29:30

8 A. Uh-huh. 15:29:32

9 Q. One that reads: "Data as of the 2018 fiscal 15:29:32

10 year." The next one reads: "Data as of the 2017 fiscal 15:29:37

11 year." 15:29:41

12 A. Uh-huh. 15:29:42

13 Q. When you submitted data to Bloomberg, were 15:29:42

14 there -- did you submit answers for two different fiscal 15:29:45

15 years? 15:29:48

16 A. That's what this is reflecting, and I do recall 15:29:52

17 that we always -- we did ask for the previous year and 15:29:56

18 the -- yeah, and the current year. 15:30:00

19 Q. So, to the best of your knowledge, does this 15:30:04

20 document reflect the submission that your team made at 15:30:06

21 the end of 2018? 15:30:11

22 A. 2018 data would not have been at the end of 15:30:19

23 2018. So I don't recall the exact lag, but there was 15:30:22

24 always a lag because year-end data isn't available when 15:30:28

25 the -- when this -- based on the due date, you need to 15:30:33

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1 figure out the due date. But the due date never enabled 15:30:38  
2 the data to be that year-end data. 15:30:43  
3 Q. You testified that at the end of 2018 you made 15:30:47  
4 a submission based on 2017 data; is that right? 15:30:51  
5 A. It's -- I believe it's the previous year's 15:30:55  
6 data. I don't know what I testified. You'd be able to 15:30:58  
7 look up exactly. But it is definitely never -- the year 15:31:01  
8 of the index never matches the year of the data. That 15:31:05  
9 much I remember. 15:31:09  
10 Q. Okay. Did you make an additional submission to 15:31:10  
11 Bloomberg at the end of 2019? 15:31:13  
12 A. We have submitted -- we've submitted at the 15:31:17  
13 time where they asked for the submissions, because now I 15:31:21  
14 don't want to misspeak when exactly they asked -- there 15:31:25  
15 is a due date. We submit for the due date, and we 15:31:28  
16 provide the data that they specifically ask for. 15:31:31  
17 Q. Do you recall being involved in two different 15:31:35  
18 submissions? 15:31:37  
19 A. I recall reviewing two different submissions, 15:31:39  
20 yes. 15:31:44  
21 Q. One based on 2017 data and one based on 2018 15:31:47  
22 data? 15:31:52  
23 A. I do not recall that, but that would be likely 15:31:55  
24 the years. Again, I don't want to say the wrong year, 15:32:02  
25 because I mean it's -- it's what were asked for. 15:32:05

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1 Q. Is it your understanding that Goldman Sachs was 15:32:13  
2 listed in the Bloomberg Gender-Equality Index both in 15:32:14  
3 2019 and 2020? 15:32:19  
4 A. Yes. We've been listed in the index. Yes. 15:32:26  
5 We've been listed in the index. 15:32:30  
6 Q. In those two years. 15:32:32  
7 A. I believe those are the two years. 15:32:35  
8 Q. And you were involved in the submission for 15:32:37  
9 both listings. 15:32:40  
10 MS. OSTRAGER: Objection. Asked and answered. 15:32:43  
11 THE WITNESS: My team put it together, and I 15:32:48  
12 reviewed it. 15:32:50  
13 BY MR. LEVIN-GESUNDHEIT: 15:32:51  
14 Q. Okay. If you scroll to the second page -- 15:32:52  
15 well, actually, let's start on the first page. 15:32:59  
16 So on the far left we see questions. Would I 15:33:01  
17 be correct to understand that those are standard 15:33:06  
18 questions asked of all of the entities that submit to the 15:33:07  
19 Bloomberg index? 15:33:12  
20 A. Yes. This is the Bloomberg provided template. 15:33:15  
21 Q. And in the workforce representation column, 15:33:24  
22 would I be correct in understanding that that column 15:33:28  
23 describes to the individual filling out the form what 15:33:31  
24 population is being considered for each question? 15:33:36  
25 A. Is -- is provided by -- these are words 15:33:43

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1 provided by Bloomberg that try to provide a descriptor 15:33:48  
2 for the item. 15:33:52  
3 Q. Does that column describe the population that's 15:33:55  
4 to be considered for each question? 15:33:58  
5 MS. OSTRAGER: Object to the form. 15:34:01  
6 THE WITNESS: It's additional information to 15:34:07  
7 guide us on what information we're providing. 15:34:09  
8 BY MR. LEVIN-GESUNDHEIT: 15:34:14  
9 Q. Okay. Let's start with one example. The first 15:34:18  
10 question: "What percentage of the company's total 15:34:20  
11 employee workforce are women?" 15:34:22  
12 A. Uh-huh. 15:34:25  
13 Q. Under Workforce Presentation, it reads: "All 15:34:26  
14 full-time employees at fiscal year end, excludes 15:34:29  
15 contractors." Is your understanding that that phrase is 15:34:32  
16 telling the individual filling out the form that the 15:34:35  
17 answer should be as to all full-time employees at the end 15:34:38  
18 of the fiscal year, excluding contractors? 15:34:42  
19 A. Yes. That's the words that are written. 15:34:46  
20 Q. I'm just trying to confirm how someone filling 15:34:50  
21 this out would interpret that column, whether it -- this 15:34:52  
22 is not meant to be a controversial question. I'm just 15:34:57  
23 confirming with you that that column is describing the 15:35:00  
24 population for which you're supposed to answer. 15:35:04  
25 Can you answer that question? 15:35:08

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1	A. That's my understanding. Yes.	15:35:09
2	Q. Great. So if you go to the second page,	15:35:11
3	Question 22, now you may need to zoom in.	15:35:17
4	Question 22 reads: "Did the company perform a	15:35:25
5	global pay audit also referred to as a pay equity review	15:35:27
6	during the fiscal year to identify differences in pay	15:35:33
7	between men and women doing equivalent work?"	15:35:36
8	A. I see it.	15:35:44
9	Q. So the second column describes the population	15:35:47
10	that should be considered. We agree about that?	15:35:52
11	A. Yes.	15:35:57
12	Q. Okay. The next column, I know the heading is	15:35:57
13	not on this page, but the next column reads: "Related	15:36:00
14	Definitions." It states: "Equal pay audit refers to	15:36:04
15	comparison of male and female employee compensation for	15:36:12
16	the same or similar work based on job content and duties,	15:36:14
17	and auditing may be performed by internal or external	15:36:18
18	party. Compensation should include base salary, bonus,	15:36:22
19	stock, and any other monetary benefits."	15:36:25
20	Do we agree that that describes what an equal	15:36:28
21	pay audit is within the context of the question?	15:36:31
22	A. That is their description of what an equal pay	15:36:35
23	audit is, yes.	15:36:38
24	Q. Okay. And then there is a -- the next set of	15:36:43
25	instructions asks the company to mark "Y" for yes if the	15:36:48

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1 company conducted such an audit. And no, if it didn't. 15:36:54

2 Do we agree about that? 15:36:59

3 A. Yes. 15:37:02

4 Q. So the next two columns with a black box around 15:37:03

5 them, the first is for data as of 2018 fiscal year-end, 15:37:07

6 and the next is for data as of 2017 fiscal year-end. 15:37:13

7 Goldman answered "Yes" to both of these 15:37:18

8 questions. Do we agree? 15:37:21

9 A. Yes. 15:37:22

10 Q. What equal pay audit is Goldman referencing in 15:37:23

11 answering "Yes" to this question? 15:37:32

12 MS. OSTRAGER: Object to the form. 15:37:38

13 THE WITNESS: Our basis for answering that 15:37:39

14 question was the same basis that I shared with you in 15:37:42

15 terms of the work of our compensation team, everything 15:37:44

16 was done by the compensation team. 15:37:51

17 BY MR. LEVIN-GESUNDHEIT: 15:37:54

18 Q. This is a reference -- is this a reference to 15:37:59

19 the annual pay equity review? 15:38:00

20 A. Our compensation team during the annual 15:38:08

21 compensation process does this review. That's what we've 15:38:11

22 discussed previously, and that is what our answer 15:38:16

23 reflects as our compensation team being the internal 15:38:19

24 party that looks at pay equity as part of the process. 15:38:24

25 Q. Is this the same pay equity review that 15:38:32

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1 determined that women were paid 99 percent of men in 15:38:34  
2 2017? 15:38:40  
3 A. This is the annual process. So the 2017 review 15:38:44  
4 was a specific effort outside of the annual process. 15:38:51  
5 Again, it predates me. I don't want to misspeak. But 15:38:58  
6 every year our compensation team looks at pay equity as 15:39:01  
7 part of the compensation process. 15:39:05  
8 Q. So to clarify, was the 2017 effort undertaken 15:39:33  
9 again in any subsequent years? 15:39:37  
10 MS. OSTRAGER: Objection. Asked and answered. 15:39:40  
11 THE WITNESS: Not to my knowledge. 15:39:45  
12 BY MR. LEVIN-GESUNDHEIT: 15:39:49  
13 Q. And the 2017 effort is the basis of the 99 15:39:57  
14 percent figure that we've been discussing earlier. 15:40:00  
15 A. Yes. 15:40:04  
16 Q. And the answers here for the -- to Bloomberg, 15:40:22  
17 the "Yes" provided in 2017, does that refer to this 2017 15:40:25  
18 effort we've been describing that ended up with the 99 15:40:35  
19 percent figure, or was it something else? 15:40:38  
20 MS. OSTRAGER: Object to the form; objection, 15:40:41  
21 asked and answered. 15:40:42  
22 THE WITNESS: Every year in the compensation 15:40:45  
23 process we look at pay equity. The compensation team 15:40:47  
24 looks at pay equity. So that is part of the process. 15:40:53  
25 //

\* \* \*

I declare under penalty of perjury, under the  
laws of the State of New Jersey, that the foregoing  
testimony, as corrected, is the truth, the whole truth,  
and nothing but the truth.

/s/ Erika Irish Brown

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ERIKA IRISH BROWN

**ERRATA SHEET**  
***Chen-Oster v. Goldman, Sachs & Co*, No. 10-cv-6950**  
**Transcript of November 13, 2020 Deposition of Erika Irish Brown**

<i>Page</i>	<i>Line(s)</i>	
2	15	Delete: “ANN-ELIZABETH OSTRAGER, ESQ.”  Reason: Transcription error.
2	16-17	Change: “1700 New York Avenue N.W. – Suite 700, Washington D.C. 20006” to “125 Broad Street New York, N.Y. 10004”  Reason: Transcription error.
5	5	Change: “Christina Chen-Oster” to “Cristina Chen-Oster”  Reason: Transcription error.
6	14	Change: “Ann” to “Annie”  Reason: Transcription error.
8	8	Change: “plaintiff’s” to “plaintiffs”  Reason: Transcription error.
10	17	Change: “Uh-huh” to “Yes”  Reason: Transcription error.
18	9	Change: “Sydney” to “SUNY”  Reason: Transcription error.
18	17	Change: “Uh-huh” to “Yes”  Reason: Transcription error.
19	18	Change: “Controller’s” to “Comptroller’s”  Reason: Transcription error.
20	5	Change: “I started business school January ’97” to “I started business school in January ’97”

<i>Page</i>	<i>Line(s)</i>	
		Reason: Transcription error.
21	13	Change: “Head of business development” to “Head of Business Development”
		Reason: Transcription error.
21	23-24	Change: “Senior vice president and head of diversity lateral recruiting” to “Senior Vice President and Head of Diversity Lateral Recruiting”
		Reason: Transcription error.
22	18-19	Change: “office of presidential personnel” to “Office of Presidential Personnel”
		Reason: Transcription error.
23	17	Change: “Providence” to “Provident”
		Reason: Transcription error.
24	13-14	Change: “Senior vice president and head of – I’m trying to – diversity executive recruiting” to “Senior Vice President and Head of – I’m trying to – Diversity Executive Recruiting”
		Reason: Transcription error.
25	5	Change: “head of executive recruiting” to “Head of Executive Recruiting”
		Reason: Transcription error.
25	23	Change: “Head of Diversity Inclusion” to “Head of Diversity & Inclusion”
		Reason: Transcription error.
27	12	Change: “global head Diversity & Inclusion” to “Global Head of Diversity & Inclusion”
		Reason: Transcription error.
27	24	Change: “HBCs” to “HBCUs”

<i>Page</i>	<i>Line(s)</i>	
		Reason: Transcription error.
27	25	Change: “diversity inclusion, conferences around diversity” to “diversity and inclusion, conferences around diversity and”
		Reason: Transcription error.
31	5	Change: “head of HCM” to “Head of HCM”
		Reason: Transcription error.
31	10-12	Change: “EMEA head of diversity, the APAC head of diversity, the India head of diversity, the Americas head of diversity” to “EMEA Head of Diversity, the APAC Head of Diversity, the India Head of Diversity, the Americas Head of Diversity”
		Reason: Transcription error.
31	13	Change: “Americas head of diversity” to “Americas Head of Diversity”
		Reason: Transcription error.
33	15	Change: “chief of staff” to “Chief of Staff”
		Reason: Transcription error.
34	2	Change: “ensure diversity lens” to “ensure a diversity lens”
		Reason: Transcription error.
34	19	Delete: “through – to – to that”
		Reason: Clarification.
36	2	Change: “GDIC” to “GIDC”
		Reason: Transcription error.
36	12	Change: “everyone on the GDC” to “everyone on the GIDC”

<i>Page</i>	<i>Line(s)</i>	
		Reason: Transcription error.
36	22	Change: “Global Diversity and Inclusion Committee” to “Global Inclusion and Diversity Committee”
		Reason: Clarification.
37	1	Change: “Global Diversity and Inclusion Committee” to “Global Inclusion and Diversity Committee”
		Reason: Clarification.
38	5	Change: “Uh-huh” to “Yes”
		Reason: Transcription error.
38	9	Change: “black” to “Black”
		Reason: Transcription error.
39	12	Change: “black” to “Black”
		Reason: Transcription error.
39	14	Change: “black” to “Black”
		Reason: Transcription error.
42	7	Change: “Because people write on people” to “Because people write feedback on people”
		Reason: Clarification.
44	23	Change: “there has only been” to “there have only been”
		Reason: Transcription error.
48	24	Change: “we’ve been through this entire deposition” to “we’ve been through this in other depositions”
		Reason: Transcription error.
49	5	Delete: “Do not --”

		Reason: Clarification.
52	18	Change: “best practice” to “best practices” Reason: Transcription error.
61	2	Change: “management committee” to “Management Committee” Reason: Transcription error.
61	5	Change: “management committee” to “Management Committee” Reason: Transcription error.
61	7	Change: “management committee” to “Management Committee” Reason: Transcription error.
61	11	Change: “management committee” to “Management Committee” Reason: Transcription error.
61	15-16	Change: “management committee” to “Management Committee” Reason: Transcription error.
61	22	Change: “management committee” to “Management Committee” Reason: Transcription error.
61	25	Change: “management committee” to “Management Committee” Reason: Transcription error.
62	5	Change: “poster” to “post” Reason: Transcription error.



<i>Page</i>	<i>Line(s)</i>	
62	10	Change: “management committee” to “Management Committee”  Reason: Transcription error.
63	9	Change: “management committee” to “Management Committee”  Reason: Transcription error.
63	13	Change: “management committee” to “Management Committee”  Reason: Transcription error.
64	8	Change: “compliance” to “Compliance”  Reason: Transcription error.
66	15	Change: “Uh-huh” to “Yes”  Reason: Transcription error.
72	10-11	Change: “boys club culture” to “boys’ club culture”  Reason: Transcription error.
72	13	Change: “boys club culture” to “boys’ club culture”  Reason: Transcription error.
72	21	Change: “Uh-huh” to “Okay”  Reason: Transcription error.
73	25	Change: “busting the boys” to “busting the boys”  Reason: Transcription error.
74	12	Change: “I would like to” to “I would have to”  Reason: Transcription error.
75	3	Change: “busting the boys club” to “busting the boys’ club”

<i>Page</i>	<i>Line(s)</i>	
		Reason: Transcription error.
75	17	Change: “busting the boys club” to “busting the boys’ club”
		Reason: Transcription error.
77	15	Change: “about a boys club” to “about a boys’ club”
		Reason: Transcription error.
83	11	Change: “Tabillo” to “Tableau”
		Reason: Transcription error.
83	12	Change: “Tabillo” to “Tableau”
		Reason: Transcription error.
83	13	Change: “Tabillo” to “Tableau”
		Reason: Transcription error.
83	22	Change: “Uh-huh” to “Okay”
		Reason: Transcription error.
91	6	Change: “Uh-huh” to “Yes”
		Reason: Transcription error.
91	13	Change: “Uh-huh” to “Yes”
		Reason: Transcription error.
92	9	Change: “Uh-huh” to “Yes”
		Reason: Transcription error.
92	19	Change: “Uh-huh” to “Yes”
		Reason: Transcription error.
94	13	Change: “pool” to “tool”

<i>Page</i>	<i>Line(s)</i>	
		Reason: Transcription error.
97	14	Change: “Uh-huh” to “Yes”
		Reason: Transcription error.
106	6	Change: “huh-huh” to “no”
		Reason: Transcription error.
111	3	Change: “Uh-huh” to “Yes”
		Reason: Transcription error.
115	20	Change: “head of HR’s chief of staff” to “Head of HR’s Chief of Staff”
		Reason: Transcription error.
116	24	Change: “HDCUs” to “HBCUs”
		Reason: Transcription error.
119	5	Change: “global head of diversity” to “Global Head of Diversity”
		Reason: Transcription error.
123	12	Change: “Yeah” to “No”
		Reason: Clarification.
124	10	Change: “DSG” to “ESG”
		Reason: Transcription error.
124	21	Change: “Uh-huh” to “Yes”
		Reason: Transcription error.
125	24-25	Change: “Part of our compensation team’s processes is exactly what it says in this document. Each year” to “Part of ELG’s process is that each year”

<i>Page</i>	<i>Line(s)</i>	
		Reason: Clarification.
126	2	Delete: “, as it says in the document.”
		Reason: Clarification.
126	10-11	Change: “I do not know the individual names of who does it” to “ELG conducts this analysis”
		Reason: Clarification.
126	14	Change: “heads of compensation” to “Heads of Compensation”
		Reason: Transcription error.
127	8-10	Change: “strong compensation team, and I have a lot of faith in the senior leadership on that team, and have no reason to believe otherwise” to “strong ELG team, and have no reason to believe otherwise”
		Reason: Clarification.
127	22	Change: “their processes” to “the processes”
		Reason: Clarification.
127	23	Change: “how they approached” to “how the firm approached”
		Reason: Clarification.
128	15	Change: “It’s based on” to “ELG’s process is based on”
		Reason: Clarification.
132	6	Change: “hear” to “share”
		Reason: Transcription error.
134	11	Change: “Uh-huh” to “Okay”
		Reason: Transcription error.
134	25	Change: “Uh-huh” to “Yes”

<i>Page</i>	<i>Line(s)</i>	
		Reason: Transcription error.
142	7	Change: “compensation team’s” to “ELG team’s”
		Reason: Clarification.
143	10	Change: “the compensation team” to “the ELG team”
		Reason: Clarification.
145	7	Change: “compensation team” to “ELG team”
		Reason: Clarification.
148	8	Change: “Uh-huh” to “Yes”
		Reason: Transcription error.
148	12	Change: “Uh-huh” to “Yes”
		Reason: Transcription error.
151	12	Change: “Uh-huh” to “Okay”
		Reason: Transcription error.
153	23	Change: “reflects as our compensation team” to “reflects as our ELG team”
		Reason: Clarification.
154	6	Change: “compensation team” to “ELG team”
		Reason: Clarification.
154	23	Change: “compensation team” to “ELG team”
		Reason: Clarification.
157	1	Change: “Uh-huh” to “Yes”
		Reason: Transcription error.